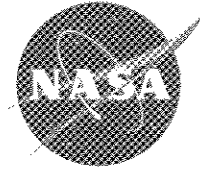


National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



March 24, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Universities  
Space Research Association (USRA) Reception on March 31, 2011

On March 31, 2011, the Universities Space Research Association (USRA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Grand Hyatt Hotel, Washington, D.C., from 5:30 PM to 8:30 PM. The USRA is made up of 105 universities in the U.S. and abroad and its goal is to expand knowledge and develop technology in space-related areas. George Washington University is a co-host of the event.

USRA is hosting the reception for members of the space community as part of its Member University Meeting and has invited approximately 200 representatives of academia, the aerospace industry, Congress, and Federal agencies to the reception. The estimated cost of the reception is \$90 per person, including the cost of food and refreshments. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the reception is in the interest of the Agency because it will further agency programs and operations. NASA attendees will have the opportunity to exchange information on NASA programs and space-related issues. Accordingly, NASA employees whose duties do not substantially affect the USRA or a majority of its members, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the reception.

However, NASA employees whose duties may substantially affect the USRA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone